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PROPOSED COUNSEL FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 DALLAS DIVISION**

IN RE:	§	CHAPTER 11
NATIONAL RIFLE ASSOCIATION OF AMERICA and	§	CASE NO. 21-30085-sgj11
SEA GIRT LLC,	§	CASE NO. 20-30080-hdh11
DEBTORS¹	§	Joint Administration Requested

**DEBTORS' MOTION FOR EMERGENCY CONSIDERATION
 OF CERTAIN "FIRST DAY" MATTERS**

On January 15, 2021 (the “Petition Date”), the National Rifle Association of America and Sea Girt LLC (the “Debtors”) filed their voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. In order to avoid irreparable harm to their estates, the Debtors require emergency consideration of the following initial case matters:

1. Debtors’ Emergency Motion for an Order Directing the Joint Administration of Chapter 11 Cases [Docket No. 2];
2. Notice of Designation of Complex Chapter 11 Case [Sea Girt LLC Docket No.3 and National Rifle Association of America Docket No. 3];

¹ The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors’ mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

3. Debtors' Emergency Motion for Entry of an Order Extending the Time to File Schedules and Statements [Docket No. 4];
4. Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms [Docket No. 5];
5. Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief [Docket No. 6]; and
6. Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes [Docket No. 7].

The Debtors' request that the Court schedule an emergency hearing on all of the above-listed motions for 2:00 p.m. on January 20, 2021.

Dated: January 19, 2021

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.
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